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**IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

CRYSTAL DUDLEY,

Plaintiff,

v.

POWELL LAW OFFICE, P.C.,

Defendant.

NO.

PLAINTIFF'S COMPLAINT
AND DEMAND FOR JURY TRIAL
(Unlawful Debt Collection Practices)

PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY TRIAL

CRYSTAL DUDLEY (Plaintiff), through her attorneys, KROHN & MOSS, LTD.,
alleges the following against POWELL LAW OFFICE, P.C., (Defendant):

INTRODUCTION

1. Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, *15 U.S.C. 1692 et seq.* (FDCPA).

JURISDICTION AND VENUE

2. Jurisdiction of this court arises pursuant to *15 U.S.C. 1692k(d)*, which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy."
3. Defendant conducts business in the state of Washington, and therefore, personal jurisdiction is established.
4. Venue is proper pursuant to *28 U.S.C. 1391(b)(2)*.

PARTIES

5. Plaintiff is a natural person residing in Lakewood, Pierce County, Washington.

6. Defendant is a debt collector as that term is defined by *15 U.S.C. 1692a(6)*.

7. Defendant is a national company with a business office in Centennial, Colorado.

8. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

FACTUAL ALLEGATIONS

9. Around February of 2011, Defendant began placing collection calls to Plaintiff in attempt to collect an alleged debt owed on a payday loan.

10. On or about February 18, 2011, Plaintiff told Defendant that she was in the process of filing for bankruptcy.

11. Defendant asked Plaintiff for her bankruptcy file number, and Plaintiff clarified that she did not yet have one as she is still in the process of filing.

12. Despite the aforementioned, Defendant continues to place collection calls to Plaintiff almost every day and at times multiple times per day.

13. On or about March 17, 2011, for example, Defendant called Plaintiff at 8:11 a.m., 11:19 a.m., 3:01 p.m., and 3:45 p.m.

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COUNT I
DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT

14. Defendant violated the FDCPA based on the following:

a. Defendant violated §1692d of the FDCPA by engaging in conduct of which the natural result is the abuse and harassment of the Plaintiff.

b. Defendant violated §1692d(5) of the FDCPA by causing a telephone to ring repeatedly and continuously with the intent to annoy, abuse, and harass Plaintiff.

WHEREFORE, Plaintiff, CRYSTAL DUDLEY, respectfully requests judgment be entered against Defendant, POWELL LAW OFFICE, P.C., for the following:

15. Statutory damages pursuant to the Fair Debt Collection Practices Act, *15 U.S.C. 1692k*,

16. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, *15 U.S.C. 1692k*

17. Any other relief that this Honorable Court deems appropriate.

DEMAND FOR JURY TRIAL

Plaintiff, CRYSTAL DUDLEY, demands a jury trial in this case.

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DATED: May 31, 2011

RESPECTFULLY SUBMITTED,
KROHN & MOSS, LTD.

By: /s/ Sharon Cousineau
Sharon Cousineau (Local Counsel)
WSB: (30061)
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VERIFICATION OF COMPLAINT AND CERTIFICATION

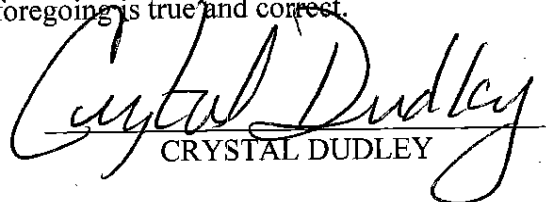
STATE OF WASHINGTON

Plaintiff, CRYSTAL DUDLEY, states the following:

1. I am the Plaintiff in this civil proceeding.
2. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
3. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law.
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
5. I have filed this Complaint in good faith and solely for the purposes set forth in it.
6. Each and every exhibit I have provided to my attorneys which has been attached to this Complaint is a true and correct copy of the original.
7. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, CRYSTAL DUDLEY, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

4/25/11
Date


CRYSTAL DUDLEY